Chapter 13

ENFORCEMENT OF INJURY AND ILLNESS PREVENTION PROGRAM

Table of Contents

Policy 2
- Statement 2
- Purpose 2
- Authority 2

Procedures 2
- I. Injury and Illness Prevention Program (IIPP) 2
- II. Effectiveness Evaluation of the IIPP 4
- III. Completion of the Evaluation of IIPP Worksheet and Scoring Criteria 11
- IV. Violations of IIPP 13
- V. Special Enforcement Procedures (SB 198 Reform of 1993) 14
- VI. Case File Review and Submittal for Management Approval 17

Chapter 13

ENFORCEMENT OF INJURY AND ILLNESS PREVENTION PROGRAM

Policy Statement: It is the policy of the Division of Occupational Safety and Health (DOSH), also known as Cal/OSHA or the Division, to enforce Section (§) 3203 of Title 8 of the California Code of Regulation (8 CCR), pertaining to the Injury and Illness Prevention Program (IIPP), in accordance with applicable provisions of the California Labor Code (Lab.) and Title 8.

Purpose: This policy is intended to set forth procedures for DOSH team members to ensure the employer's Injury and Illness Prevention Program is effective at protecting workers and preventing injuries and illnesses in the workplace.

Authority: DOSH will administer this policy in compliance with all applicable laws, rules, and guidance:

- California Code of Regulations, Title 8, Sections 336 and 3203
- California Labor Code, Section 6319, 6401.7, and 6428.5
- Decisions of the Occupational Safety and Health Appeals Board (OSHAB) and California Appellate Courts

Procedures:

I. Injury and Illness Prevention Program

Employers in California are required by law to establish, implement, and maintain an Injury and Illness Prevention Program (IIPP), which is a written workplace safety plan designed to proactively identify and correct workplace hazards, ensuring that safety culture and practices are effective in protecting workers and preventing injuries and illnesses.

The field evaluation of the effectiveness of an employer's IIPP must include, at a minimum, information contained from interviews with a representative number of employees, supervisors/managers, and the members of any labor/management safety and health committee. It may also include information obtained from records review, and workplace inspection.

General Procedures:

A. DOSH must evaluate the effectiveness of an employer's IIPP in the course of every inspection/investigation and must document the results of the evaluation within the case file.

B. Evaluation of the employer's IIPP shall be limited to a review of new circumstances and the continuing effectiveness of the IIPP when:

   1. An inspection of the employer's workplace is conducted within 180 days of an earlier inspection when the employer was determined to be in compliance.

   2. The employer or worksite is a member in good standing of either the Voluntary Protection Program, Safety and Health Recognition Program (SHARP), or Golden Gate exemption programs. See Policies and Procedures (P&Ps) Chapter 7: *Inspection Procedures* and Chapter 28: *Enforcement Support for VPP, Golden State, and Golden Eagl*e.

   3. An inspection includes work for which a permit is required for certain types of hazardous employment pursuant to Labor Code § 6500 and for which a permit has been issued pursuant to Labor Code § 6502, or a registration is required and has been granted pursuant to Labor Code § 6501.5. Permitted activities specifically involved can be found in Chapter 35: *Construction Activity Permits and Inspection of Permitted Activities*, Chapter 36: *Tower Crane Erection and Operating Permits*, Chapter 34: *Underground Diesel Engine Permits*, and Chapter 39: *Bungee Jumping Permits*.

C. The employer’s written IIPP must be evaluated for its effectiveness and to ensure that procedures and/or systems are described and implemented for each element (a)(1) through (8) specific to the employer’s operations and/or worksite. Compliance Safety and Health Officers (CSHOs) must document all notes and other information of evaluation on the Cal/OSHA Form 45-1: *Evaluation Worksheet for Injury and Illness Prevention Program* and rate with a score in accordance with criteria set forth in Section III of this policy, *Completion of the Evaluation of IIPP Worksheet and Scoring Criteria*.

D. Every employer's IIPP must be in writing, and a copy must be maintained at each of the employer's worksites. CSHOs must request, review, and obtain a copy of the IIPP during the walkaround inspection.

   When employees are dispatched to work outside a fixed workplace (e.g., in agriculture, construction, installation, repair, delivery or service operations), a

copy of the employer's written IIPP may be maintained at the employees' established, central workplace, or be available online with unobstructed access through a company server or website. CSHOs must request to view and evaluate how an employee may access a copy of the written IIPP.

In those instances, CSHOs must request a copy of the employer's written IIPP. If the IIPP is not received by DOSH within three (3) working days, and from a discussion with employees, it is determined that the employer does not have an IIPP, the employer will be cited for failure to have an IIPP.

E. Every employer's IIPP shall cover all of the employer's own employees, and all other employees who the employer controls or directs and directly supervises on the job to the extent these workers are exposed to worksite and job assignment specific hazards.

F. For purposes of calculating the gravity-based penalty of a serious violation under 8 CCR § 336(d)(8) and mitigating the cumulative effect of multiple violations under 8 CCR § 336(k), an employer will not be considered by DOSH to have an operative IIPP if they have not met the criteria for substantial compliance set forth in 8 CCR § 3203 and controlling OSHAB decisions. Such determinations are separate from the evaluation of whether a violation exists. See Section III.C. of this policy to determine an operative IIPP.

II. Effectiveness Evaluation of the IIPP

A. CSHOs must assess all eight IIPP elements during the course of the inspection through interviews as well as requesting relevant documents via the Cal/OSHA Form 1AY: *Document Request*.

B. A request for documents must include records required to be maintained as part of the IIPP, including but not limited to, scheduled and periodic inspections, safety and health training records, disciplinary records, accident/incident investigation forms, written procedures, or safety committee meeting minutes. These could also include evaluations of other required plans that may or may not be included as part of the IIPP, depending on industry and operations. Examples of those plans could include the following:

- § 2320.11 – Hazard assessment for flames or for electric arcs
- § 3155 – Training to operate or work on tramways
- § 3205 – COVID-19 procedures

- § 3342 – Workplace Violence Prevention Plan
- § 3345 – Musculoskeletal Injury Prevention Plan
- § 3395 – Heat Illness Prevention for Outdoor
- § 3396 – Heat Illness Prevention for Indoor
- § 3421 – Training for Tree Work, Maintenance or Removal
- § 4402 – Employee instruction regarding Pulp, Paper and Paperboard Mills
- § 4418 – Industrial Kiln Guns and Ammunition
- § 5120 – Patient protection and health care worker back and musculoskeletal injury prevention plan
- § 5141.1 – Wildfire smoke hazards
- § 5199 – Screening procedures for outpatient dental clinics and outpatient medical specialty practices
- § 5199.1 – Procedures for preventing exposure to zoonotic aerosol transmissible pathogens
- § 8407 – Safety Training and Instruction for Tunneling

C. CSHOs must interview a representative number of both employees and management, depending on the nature and scope of the inspection, to determine the effectiveness of the implementation of their written IIPP and document the findings. Interviews are essential to evaluating the employer's IIPP and shall include employees and supervisor(s)/manager(s) from each of the various operations or processes at the worksite to properly assess and verify aspects of their IIPP.

D. Interviews with employees must include, but not limited to, questions about training, written work procedures, actual work practices, and hazards which employees may be exposed to in the workplace.

E. Interviews with management are essential to assess their depth of leadership in the IIPP, including but not limited to, identification and correction of hazards, implementation of the IIPP, established work practices and procedures, and training.

F. The primary objective of interviews is to gather comprehensive information, verify facts, and understand the full context of potential compliance issues. To achieve this, CSHOs must not be limited to asking the example questions below and must include probing questions to elicit and expand more detailed and accurate responses.

The CSHOs' evaluation of the effectiveness of an employer's IIPP includes, but is not limited to, a determination of the effectiveness of the following elements:

1. **Responsibility**

   Whether the employer's written IIPP provides the name and/or job title of the person or persons with the authority and the responsibility for implementing the program. If job title alone is used to identify the responsible person(s), a method must be available, e.g., a list of persons by job titles, by which employees can identify the name of the individual whose title is designated as the person(s) responsible for the IIPP.

   ***Sample effectiveness measure*:**
   - Are employees actually aware of who the person is with the authority and responsibility for their IIPP, and can they access the person if necessary?

2. **Compliance**

   Whether a system for ensuring that employees comply with safe and healthful work practices is set forth in the employer's written IIPP.

   Sample effectiveness measure:
   - Have employees been recognized for performing safe and healthful work practices, disciplined for performing unsafe or unhealthful work practices, or offered training or retraining programs to ensure compliance with safe and healthful work practices?

   - Has the employer established safety and health rules and work practices and how do they ensure compliance of those rules?

3. **Communication**

   Whether a system for communicating with employees in a form readily understandable by all affected employees about safety and health matters, e.g., meetings, training programs, posting, written communications, an anonymous notification system, is set forth in the employer's written IIPP, and whether employees are encouraged to inform their employer about hazards at the worksite without fear of reprisal.

   Sample effectiveness measure:

- Are employees actually aware of methods to communicate with their employer about health and safety matters, and have they utilized the available communication methods?

- How is safety information communicated to employees?

- Are there employees in workplace that use languages other than English? Are safety meetings held? How often? What are typical subjects discussed?

4. **Hazard Assessment**

   Whether procedures for identifying and evaluating workplace hazards, such as scheduled periodic inspections performed by a competent observer, are set forth in the employer's written IIPP, and are performed at the following times:

   a. When the IIPP was first established,

   b. When new substances, processes, procedures, or equipment are introduced to the workplace that represent a new occupational safety and/or health hazard, and

   c. Whenever the employer is made aware of a new or previously unrecognized hazard.

   ***Sample effectiveness measure*:**
   - Does implementation of the procedures chosen by the employer result in a comprehensive evaluation of the hazards present at the workplace?

   - What kind of safety inspections are done in the workplace? How often? Is it documented?

5. **Accident/Exposure Investigation**

   Whether a procedure to investigate the occurrence of occupational injuries or illnesses is set forth in the employer's written IIPP.

   Sample effectiveness measure:
   - Does implementation of the investigational procedures chosen by the employer result in a determination of the cause(s) of the occupational injury or illness?

- Who performs an investigation where there is an injury, illness or incident?

- Does anyone review the investigation once completed?

6. **Hazard Correction**

   Whether methods and/or procedures for correcting unsafe or unhealthful work conditions, work practices and procedures, in a timely manner based on the severity of the hazard, are set forth in the employer's written IIPP. Specific abatement methods must be included in the employer's IIPP and must address:

   a. When unsafe or unhealthful conditions, work practices or procedures are observed or discovered, and

   b. When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, all exposed personnel must be removed from the area except those necessary to correct the existing condition. Employees necessary to correct the condition must be provided the necessary safeguards.

   Sample effectiveness measure:
   - If something is unsafe, broken or hazardous, is there a system to ensure it gets corrected?

   - Does implementation of the methods and/or procedures chosen by the employer to correct a workplace hazard achieve abatement of the hazard?

7. **Training and Instruction**

   Whether an effective training program designed to instruct employees in general safe work practices and to provide specific instruction with respect to hazards specific to each employee's job assignment is set forth in the employer's written IIPP and whether the required training is provided as follows:

   a. When the IIPP is first established,

   b. To all new employees,

c. To all employees given new job assignments for which training has not previously been received,

d. Whenever new substances, processes, procedures or equipment are introduced into the workplace and represent a new hazard,

e. Whenever the employer is made aware of a new or previously unrecognized workplace hazard, and

f. For supervisors to familiarize them with the safety and health hazards to which employees under their immediate direction and control may be exposed and how to communicate information about those hazards effectively.

Sample effectiveness measure:

- Does training result in an increase in a worker's understanding of workplace hazards, and an improvement in a worker's performance of safe and healthy work practices?

- Ask employees to tell about the training – when someone is new to the workplace? When new processes or procedures are introduced? Refresher training?

- Is there a sign-in sheet?

- Are there written procedures/instructions on how to perform, i.e. - operation, processes, etc.? If so, has training been provided to them?

- Have supervisors received training on identifying hazards?

8. **Employee Access to the IIPP**

Whether employees are aware of the availability of the written IIPP and their rights to be able to access a copy and how to access it.

Sample effectiveness measure:

- Is the IIPP available to employees?

- Where can employees obtain or view a copy of the IIPP?

- Have employees demonstrated how they can access the IIPP?

- Ask employer how the procedure is communicated to employees?

9. **Recordkeeping**

   Whether there is adequate written documentation of the steps taken to implement and maintain the employer's IIPP including:

   a. Records of scheduled and periodic workplace inspections, including person(s) conducting the inspections, any unsafe condition and/or work practice which has been identified, the action and timetable for correction of the identified hazards, and whether, for employers with ten or more employees, the records have been maintained for at least three years.

      EXCEPTION: Employers with fewer than ten employees may elect to maintain the inspection records only until the hazard is corrected.

   b. Records of safety and health training, including employee name or other identifier, training dates, the type(s) of training, training providers, and whether, for employers with ten or more employees, the records have been maintained for at least three years.

      EXCEPTIONS: Exceptions to the three-year maintenance rule include:

      i. For employers with fewer than ten employees, a log of instructions can be maintained which provided instructions to the employee with respect to the hazards unique to the employee's job assignment when first hired or assigned new duties.

      ii. Training records for employees who have worked for less than one year for the employer need not be retained beyond the term of employment if they are provided to the employee upon termination of employment.

   Sample effectiveness measure:

   - Does employer have records of all scheduled and periodic inspections? Health and safety training records? Investigations conducted as a result of an incident or accident? Safety meetings?

10. **Labor/Management Safety and Health Committee**

    Whether, if the employer utilizes a labor/management safety and health committee to comply with the communication requirements of the IIPP standard, the committee meets the requirements found in 8 CCR

§ 3203(c)(1)-(7).

Sample effectiveness measure:

- Are regular meetings held?
- Who are members of the committee?
- What responsibilities do the committee members hold?

III. Completion of the Evaluation of IIPP Worksheet and Scoring Criteria

A. The Cal/OSHA Form 45-1: *Evaluation Worksheet for Injury and Illness Prevention Program* is used to document the evaluation of the employer's IIPP. Each element of 8 CCR § 3203 should be rated with a score between zero (0) to three (3) using the following criteria:

- **Zero (0):** No established procedures and/or system present or implementation
- **One (1):** Some procedures and/or system present and some implementation but improvements are needed
- **Two (2):** There are considerable procedures and/or systems present and partial implementation with only minor improvements needed
- **Three (3):** There are established and effective procedures and/or system present and implementation for the purposes of the inspection at issue

An element with scores of zero (0) or one (1) establishes a violation of 8 CCR § 3203 or § 1509, depending on the industry.

An element with a score of two (2) must be reviewed with the District Manager (DM), Senior Industrial Hygienist Supervisor (SIHS) and/or an authorized designee, which is herein referred to as DM/SIHS/Designee, to determine whether an enforcement action is necessary.

B. **Determination of Compliance**

1. CSHOs must document on the worksheet whether each element of the IIPP is in writing and if it is being implemented using the criteria set forth in the above Section III. A.

2. A failure to establish an IIPP indicates that the employer has not created the foundational framework for safety and health in the workplace. For example, this could include, but not limited to, not having a written IIPP, or elements missing in the IIPP.

3. A failure to implement an IIPP indicates that the employer may have an established program but is not being put into practice. For example, this could include, but not limited to, lack of training, procedures not being followed, or no evidence that the employer is enforcing policies.

4. A failure to maintain an IIPP indicates that the employer has a program that may be outdated, ineffective, or fallen into disuse. For example, this could include, but not limited to, outdated information, lack of review or update to reflect changes in operations, equipment or regulations, or no records of regular audits or reviews.

C. **Determination of an Operative IIPP**

When an employer's IIPP meets the criteria for substantial compliance set forth in 8 CCR § 3203, the IIPP is deemed operative for purposes of calculating the gravity-based penalty of a serious violation under 8 CCR § 336(d)(8) and mitigating the cumulative effect of multiple violations under 8 CCR § 336(k). This determination is separate from the evaluation of whether a violation exists or not, and should be determined on a case-by-case basis.

Examples of when an IIPP would be considered inoperative include, but are not limited to, the following:

1. Employer does not have a written IIPP.

2. Employer does not have a system for ensuring that employees comply with safe and healthy work practices including training and retraining programs, disciplinary actions, or any other such means.

3. Employer does not have a system for communicating with employees in a form readily understandable by all affected employees on matters relating to occupational safety and health, including provisions designed to encourage employees to inform the employer of hazards at the worksite without fear of reprisal, such as meetings, training programs, posting,

written communications, a system of anonymous notification by employees about hazards, labor/management safety and health committees, or any other means.

NOTE: There are OSHAB decisions where violations did not render the IIPP inoperative. DOSH personnel must review prior to making adjustments to penalties.

IV. Violations of the Injury and Illness Prevention Program

A. In determining whether to cite a violation of 8 CCR § 3203 as general or serious, CSHOs must use the guidelines found in Appendices A, B and C of Chapter 7.

B. CSHOs must determine the scope and industry of the employer's operation. The following are industries with specific Title 8 regulations referencing § 3203:

- § 1509 – Construction
- § 3421 – Tree Work
- § 6507 – Petroleum: Drilling & Production
- § 6760 – Petroleum: Refinery
- § 8350 – Ship Building, Repairing, & Breaking
- § 8406 – Tunneling

When an employer in the above industries has violated its specific IIPP standard, CSHOs must cite the particular 8 CCR section and reference the applicable subsection of § 3203 and must reference in the citation how the employer's IIPP failed to comply with § 3203.

C. **Regulatory Violations**

For regulatory violations of the recordkeeping requirements in subsection (b) of § 3203, an employer must be cited for a single regulatory violation in a manner similar to general violations of subsection (a) of § 3203.

However, if DOSH determines that the violative condition shall be classified as repeat or willful, a separate citation must be issued for each element identified under subsection (b).

D. **General Violations**

For general violations of 8 CCR § 3203(a), the employer must be cited for a single violation of this subsection.

Example:
If the employer has no IIPP, a single general violation alleging failure to establish, implement, and maintain an effective IIPP will be issued. In contrast, if the IIPP is not in writing, or it does not meet each of the required elements set forth in subsections (a)(1) through (8), a single general violation will identify which elements are not in compliance with the subsection by reference in separate paragraphs to the particular element of the standard and a description of the violative condition.

However, if DOSH determines that the violative condition should be classified as serious, repeat, or willful, a separate citation will be issued for each element identified under subsection (a).

E. Penalty Adjustments

1. In such cases where citations involve a violation of the IIPP considering it to be inoperative (see Section III.C. of this policy), the penalty for a serious violation would only be subject to an adjustment based on size, and any reductions under 8 CCR § 336(k) for violations involving the same hazard would not be available. Refer to procedures for penalty calculations in the appendix entitled *Proposed Penalty* of Chapter 18: *Citation and Case File Review*.

   In addition, employers who are cited for a serious violation and do not have an operative IIPP shall receive an abatement credit, unless the serious violation results from a serious injury or illness.

2. In such cases in which the employer's IIPP is deemed operative under Labor Code § 6428.5 (see Section III.C. of this policy), there would be basis to reduce penalties for multiple violations with the same hazard and to adjust penalties for serious violations based on good faith or history.

V. Special Enforcement Procedures (SB 198 Reform of 1993)

A. Special Enforcement Provisions for Construction Employers (8 CCR § 1509)

1. DOSH has prepared a Model Injury and Illness Prevention Program for Construction Employers and has made copies of this Model Program

available to employers upon request (see Attachment D for *Model IIPP for Employers with Seasonal or Intermittent Workers*).

2. An employer subject to § 1509 shall also adopt a Code of Safe Practices which relates to the employer's operations, in language equivalent to the relevant parts of Plate A-3 in the Appendix of the Construction Safety Orders (8 CCR Division 1, Chapter 4, Subchapter 4). CSHOs shall state in the citation how the employer failed to comply with §1509(b).

3. An employer subject to §1509 shall post a Code of Safe Practices at a conspicuous location at each job site office or provide a Code of Safe Practices to each supervisory employee who shall have it readily available. CSHOs shall reference in the citation how the employer failed to comply with §1509(c).

4. An employer subject to §1509 must conduct periodic meetings of supervisory employees under the direction of management for the discussion of safety problems and accidents that have occurred. CSHOs shall reference in the citation how the employer failed to comply with §1509(d).

5. An employer subject to §1509 shall conduct "toolbox" or "tailgate" safety meetings, or the equivalent, with their crews at least every 10 working days to emphasize safety. CSHOs shall reference in the citation how the employer failed to comply with §1509(e).

6. Those employers required to be licensed under the Contractors State License Board (CSLB) (Chapter 9, Section 7000) of the Division 3 Business and Professions Code may use records relating to employee training provided to the employer in connection with a safety and health training program approved by DOSH, and shall only be required to keep records of those steps taken to implement and maintain the program with respect to the hazards specific to the employee's job duties.

B. **Special Enforcement Provisions for Specified Small Employers (Small Employer Relief)**

1. For employers with fewer than 20 employees during the calendar year in which the inspection is conducted who are in industries that are not on a designated List of High-Hazard Industries (see Attachment A for the *List of High-Hazard Industries*) and who have a Workers' Compensation Experience Modification Rate of 1.1 or less, and for any employers with fewer than 20 employees during the calendar year in which the inspection is conducted who are in industries that are on a designated List of Low-Hazard Industries, written documentation of the IIPP is limited to the following requirements:

a. Written documentation of the identity of the person or persons with authority and responsibility for implementing the program (8 CCR § 3203[a][1]).

b. Written documentation of scheduled periodic inspections to identify unsafe conditions and work practices (8 CCR § 3203[a][4]).

c. Written documentation of training and instruction (8 CCR § 3203[a][7]).

2. In order to be within the scope of the limited documentation requirements, employers with fewer than 20 employees during the calendar year in which the inspection is conducted who are in industries that are not on a designated List of High-Hazard Industries must provide documentation to the Division that the Workers' Compensation Experience Modification Rate is 1.1 or less.

3. Any employer who is not experience-rated by their workers' compensation insurance carrier, or who cannot provide DOSH documentation that their experience modification rate is 1.1 or less, will not be able to qualify for small employer relief because DOSH does not consider the absence of an experience modification rate to be equivalent to an experience modification rate of zero (and therefore less than 1.1).

4. Failure to provide such documentation will result in such employers being required to comply with all written documentation requirements set forth in 8 CCR § 3203.

   Moreover, even though documentation requirements for the foregoing specified employers are limited, the IIPP must address orally all of the elements set forth in 8 CCR § 3203(a), which CSHOs must evaluate through employee interviews.

C. **Special Enforcement Provisions for Employers in Non-High Hazard Industries**

DOSH has prepared a Model Injury and Illness Prevention Program for Non-High Hazard Employers and has made copies of this Model Program available to employers upon request (see Attachment C for *Model IIPP for Non-High Hazard Industries*).

Any employer in a non- high-hazard industry who adopts, posts, and implements the Model IIPP in Good Faith is not subject to a civil penalty for a first violation of 8 CCR §3203. See the appendix entitled *Proposed Penalty* of Chapter 18. However, any such employer who is not in compliance with

§3203(a) shall be cited for a violation in accordance with the provisions of this policy.

D. **Special Enforcement Provisions for Employers in Industries Which Have Historically Utilized Seasonal or Intermittent Employment**

1. DOSH has prepared a Model Injury and Illness Prevention Program for Employers in Industries with Intermittent Employment (see Attachment D).

2. Any employer in such an industry shall be deemed in compliance with respect to requirements for a written IIPP if the employer adopts the Model IIPP prepared by DOSH and complies with the requirements set forth therein. However, even though written program requirements for the foregoing employers are limited, the IIPP must address orally all of the elements set forth in 8 CCR § 3203(a), which CSHOs must evaluate through employee interviews.

E. **Special Enforcement Provisions for Local Governmental Entities**

Local governmental entities (any county, city, city and county, or district, and any public or quasi-public corporation or public agency therein) are required to maintain a written IIPP.

Such local governmental employers are not required to keep records pursuant to 8 CCR §3203(b) concerning the steps taken to implement and maintain the Program. Even though documentation requirements for the foregoing specified employers are limited, the IIPP must address orally all of the elements set forth in §3203(a), which CSHOs shall evaluate through employee interviews.

VI. Case File Review and Submittal for Management Approval

A. If the employer has a written IIPP, CSHOs must ensure a copy of the employer's written IIPP is in the case file. Otherwise, if the employer has corrected the deficiency of a written IIPP during the inspection, upon review and acceptance of the IIPP, a copy must be identified and included in the case file as abatement.

B. CSHOs must include in the case file the completed Cal/OSHA Form 45-1: *Evaluation Worksheet for Injury and Illness Prevention Program*.

C. DM/SIHS/Designee must review the contents of the case file to ensure interviews of employees and management were performed and the Cal/OSHA

Form 45-1 is completed to determine the sufficiency of the IIPP assessment and adequacy of proposed citation(s) and/or no violation.

D. For fatality and high-profile accident investigations, the Regional Manager (RM) must review the completed Cal/OSHA Form 45-1 in addition to the other documents as per Chapter 14: *Other Types of Inspections*.